

**EXHIBIT 3**

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

W.O. SHIPPING GROUP B.V., N.L.,

Plaintiff,

vs.

OMI CORPORATION f/k/a OMAHA INC., OMI  
MARINE CONSULTANCY (DEUTSCHLAND)  
GmbH & CO. KG, TEEKAY SHIPPING  
CORPORATION and A/S  
DAMPSKIBSSELSKABET TORM a/k/a AS  
STEAMSHIP CO. TORM,

Defendants.

Civil Action No. 07-CV-01381(MRK)

December 21, 2007

**DEFENDANTS' CONSOLIDATED MOTION  
TO DISMISS THE AMENDED COMPLAINT**

Pursuant to Rules 12(b)(1), 12(b)(3), and 12(b)(6) of the Federal Rules of Civil Procedure, Defendants OMI Corporation, OMI Marine Consultancy (Deutschland) GmbH & Co. KG, Teekay Shipping Corporation, and A/S Dampsikbsselskabet Torm hereby move this Court for an order dismissing the Amended Complaint for lack of subject matter jurisdiction, on the basis of an arbitration clause, *forum non conveniens*, and failure to state a claim upon which relief can be granted. The grounds for this motion are set forth in the accompanying memorandum and supporting declaration.

**ORAL ARGUMENT REQUESTED  
TESTIMONY NOT REQUIRED**

Dated: Hartford, Connecticut  
December 21, 2007

DEFENDANTS, OMI CORPORATION f/k/a  
OMAHA, INC., OMI MARINE  
CONSULTANCY (DEUTSCHLAND) GmbH  
& CO. KG, TEEKAY SHIPPING  
CORPORATION and A/S  
DAMPSKIBSSELSKABET TORM a/k/a AS  
STEAMSHIP CO. TORM,

/s/ Michael P. Shea

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Its Attorney

**CERTIFICATION**

I hereby certify that on this date a copy of the foregoing Defendants' Consolidated Motion to Dismiss the Amended Complaint was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Michael P. Shea

Michael P. Shea (ct19598)